

REMARKS

In the June 28, 2005 Office Action, the Examiner noted that claims 1-19 were pending in the application and were rejected under 35 USC § 103(a). In rejecting the claims, U.S. Patents 6,233,471 to Egger et al. (Reference A in the November 17, 2003 Office Action) and 6,289,342 to Lawrence et al. (Reference B in the January 4, 2005 Office Action) were cited. Claims 1-19 remain in the case. The Examiner's rejections are traversed below.

The claims continue to be rejected over the same combination of Egger et al. and Lawrence et al. as in the January 4, 2005 Office Action. The only changes from the rejection of the claims in the January 4, 2005 Office Action relate to the claim amendments in the Amendment filed April 4, 2005. In addition to the portions of Egger et al. cited previously, "Col. 12 lines 40-45 and col. 14, lines 2-27" (Office Action, page 3, line 4) were cited as disclosing the reference feature/reference reasons correspondence table recited in all of the independent claims except claim 19, and "Fig. 6 and col. 14 lines 21 *et seq.*" (Office Action, page 5, line 15) of Egger et al. were cited as disclosing the pattern data list storage device recited in claims 4 and 19.

The newly cited portions of Egger et al. refer to "a cross-referenced database 54" (column 14, line 24) and state that node 2008 might be all or part of an object in the database (see column 12, lines 42-43) or "a document, a section of a document, a World Wide Web page, or an idea or concept, such as a topic name" (column 12, lines 43-45). It is submitted that merely including the word "cross-referenced" does not teach or suggest that the database indicates "correspondence between reference features and reference reasons" (e.g., claim 1, lines 2-3).

The first description of database 54 appears at column 10, lines 25-41 as "any device which will hold data. For example, the database 54 can consist of any type of magnetic or optical storing device for a computer. ... the database 54 provides the large storage capacity necessary to maintain the many records of textual objects." As described at column 13, lines 2-14, database 54 is formed of nodes and links implemented in a table format. These nodes and links represent a data structure of the database in which a text object (document) to be searched is stored and thus, is itself the document data, not a correspondence table for the document data.

The description of Fig. 2 at column 11, lines 35-67 refers to indexing database 54 for use by "the Computer Search Program for Data Represented by Matrices (CSPDM 66)" (column 11, lines 47-48), but does not describe the database 54 as containing a table of the type recited in the independent claims. In addition, FIG. 3D is described as depicting "a sequence of

subroutines of the Proximity Indexing Application Program 62 which first sections and then indexes ... sections of 'core english (sic) words' 140 contained in the database 54" (column 12, lines 21-24) and FIGS. 3E-3H were described as "a preferred embodiment for representing the data in a database 54" (column 12, lines 30-31), but none of this was cited as disclosing a reference feature/reference reasons correspondence table as recited in the independent claims and no suggestion of "storing correspondence between reference features and reference reasons" has been found in these drawings or their description.

As noted above, the Office Action asserted that the pattern data list recited in claim 19 was disclosed by Fig. 6 of Egger et al. However, Fig. 6 is merely a pattern showing the relation between text objects when "proximity indexing" is applied to database 54. There is no suggestion in Fig. 6 or its description that a pattern is represented in a text object as text. Thus, there is no suggestion in Egger et al. of "storing pieces of pattern information which is likely to appear in the given document data and indicate that documents are cited" (claim 19, lines 5-6). Therefore, it is submitted that claim 19 patentably distinguishes over Egger et al. in view of Lawrence et al.

Furthermore, claims 5 and 12-18 have been amended to clarify that the "reason why a referred document is cited" (e.g., claim 5, line 6) is "retrieved from the reference feature/reference reason correspondence table using a feature of the specific document in the neighborhood of the position as a reference feature" (e.g., claim 5, lines 7-9). As discussed in the April 4, 2005 Amendment, this is not taught or suggested by Egger et al. in view of Lawrence et al.

For all of the above reasons, it is submitted that the claims patentably distinguish over the applied art.

Summary

It is submitted that the references cited by the Examiner, taken individually or in combination, do not teach or suggest the features of the present claimed invention. Thus, it is submitted that claims 1-19 are in a condition suitable for allowance. Entry of the Amendment, reconsideration of the claims and an early Notice of Allowance are earnestly solicited.

Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

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If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

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